

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )

Administration of the )  
North American Numbering Plan )  
Notice of Inquiry )

CC Docket No. 92-237  
Phase I

**REPLY COMMENTS OF THE AMERITECH OPERATING COMPANIES**

The Ameritech Operating Companies<sup>1</sup> hereby submit these Reply  
Comments in response to Phase I of the Federal Communications Commission's  
Notice of Inquiry in the above-captioned docket.<sup>2</sup>

**A. Administration of the North American Numbering Plan (NANP)**

Many parties agree with the view of the Commission and the Companies  
that Bellcore has done an excellent job of administering the North American  
Numbering Plan – a job which has clearly become more difficult as the demand  
for numbering resources has burgeoned.<sup>3</sup> The Companies have fully explained  
why Bellcore is an efficient, effective administrator of the NANP, and they will  
not repeat those comments here.<sup>4</sup>

Other comments evince a widespread belief that the current arrangement  
would be improved if it were modified – perhaps by creating some advisory or

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<sup>1</sup>The Ameritech Operating Companies ("Companies") are: Illinois Bell Telephone Company, Indiana Bell Telephone Company, Incorporated, Michigan Bell Telephone Company, The Ohio Bell Telephone Company and Wisconsin Bell, Inc.

<sup>2</sup>Administration of the North American Numbering Plan, Notice of Inquiry, CC Docket No. 92-237, 7 FCC Rcd 6837 (released October 29, 1992) (NOI).

<sup>3</sup>See, e.g., Comments of American Personal Communications at 1; Comments of Bell Canada at 3; Comments of Centel at 2; Comments of North Pittsburgh Telephone at 1-2.

<sup>4</sup>Comments of the Ameritech Operating Companies at 4-5.

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oversight group<sup>5</sup> – or if it were replaced with a new arrangement altogether.<sup>6</sup> If the Commission proceeds with a Notice of Proposed Rulemaking on this issue, the Companies invite careful consideration of at least three issues which were highlighted in the Comments filed by various parties in this proceeding.

First, costs for NANP administration must be recovered from the industry as a whole, not just from the RBOCs. Fortunately, virtually all commenters acknowledge that the RBOCs should no longer fund NANP activities by themselves. Instead, all NANP costs must be recovered from the users of numbering resources, either on a basis of cost-causation,<sup>7</sup> customer count,<sup>8</sup> or some other pro rata measure. Even if NANP administration remains with Bellcore, the Commission should pursue GTE's suggestion that the entire industry as a whole share in the funding of the NANPA.<sup>9</sup>

Second, any successor to Bellcore's numbering administration responsibilities must be extraordinarily competent. Contrary to McCaw's observation, the NANP administrator must have more than a rudimentary understanding of telephones and mathematics.<sup>10</sup> If the NANP administrator is to be anything more than an "administrative law judge" who collects facts and submits them to the Commission or some other body for resolution, it must have unquestioned expertise in the industry. As Bellcore points out, it must also be able to exercise leadership and initiative while building consensus in an often

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<sup>5</sup>Comments of GTE at 7; Comments of Sprint at 2-6.

<sup>6</sup>Comments of AT&T at 4-5; Comments of Teleport at 5-6.

<sup>7</sup>Comments of Cox at 11.

<sup>8</sup>Comments of NARUC at 4.

<sup>9</sup>Comments of GTE at 11.

<sup>10</sup>Comments of McCaw at 16.

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fragmented industry.<sup>11</sup> Further, it must be able to coordinate numbering policy with the 17 other nations in World Zone 1. The Commission – together with other member nations of World Zone 1 – must take great care in selecting a new numbering administrator.

Third, the Commission should cautiously approach the various proposals to allow industry boards or committees to actively manage Bellcore's administration of the NANP.<sup>12</sup> The Companies are concerned that this arrangement could make Bellcore and its owners legally liable for implementing the policy directives of others, especially given the "increasingly litigious nature of requests for numbering resources."<sup>13</sup> Also, it is not clear whether an industry board – made up of representatives from all industry segments – could reach the consensus needed to resolve numbering issues.

#### B. Number Portability

The Companies continue to support the concept of "number portability", *i.e.*, the ability of end users to retain their assigned number when they switch service providers. As the Companies explain in their Comments, they currently offer at least two forms of local number portability. First, customers can – and frequently do – purchase call forwarding services so that they can retain their "old" number after they move from one exchange to another. For example, a business with the number 248-1234 may move to the other side of town, and be assigned a new number, 727-1234. By purchasing a central office-based call forwarding service, customers of this business would be able to dial 248-1234 and

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<sup>11</sup>Comments of Bellcore at 3-4.

<sup>12</sup>*See, e.g.*, Comments of National Cable Television Association at 3.

<sup>13</sup>Comments of McCaw Cellular at 8.

be transparently forwarded to 727-1234. This arrangement would be equally effective for a business which moved from the Companies' service to the service of a competitive provider.

Second, the Companies have deployed direct inward dialing (DID) trunks for use with PBXs and alternative provider switches. These trunks permit customers to obtain blocks of numbers without ordering an equivalent number of lines. The end office switch routes all incoming calls directly to the other switch so that it can route the call to the appropriate station on the customer's premises. Because the routing functionality is resident in the end office switch, when one of the Companies' Centrex customers moves to a competitively-provided switch, that customer can retain its numbers.

It is clear that several commenters have in mind a different view of "number portability." Specifically, MPS and Teleport envision a gigantic version of the 800 Database system -- where every originating seven-digit call is routed to a distant database to determine the "presubscribed" carrier before being returned to the point of origination. It is not clear whether customer demand and customer willingness to pay would support such an elaborate system. Nor is it clear whether the costs of such a system justify its deployment. There is certainly nothing in the record so far which substantively addresses these complex questions. Up to this point, all the record contains are conclusory assertions on these points.<sup>14</sup> The Commission should continue to monitor the number

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<sup>14</sup>Comments of MPS at 6.

portability issue, but this effort must begin with an understanding of the exact nature of the customer need and customer benefits which are at issue.

Respectfully submitted,

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